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Attorneys for Defendant

MATSON NAVIGATION COMPANY, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

BERT MEYER,

Plaintiff,

vs.

MATSON NAVIGATION COMPANY,  
INC.,

Defendant.

CIVIL NO. 04-00049 HG/BMK  
(In Admiralty)

DEFENDANT MATSON  
NAVIGATION COMPANY, INC.'S  
AMENDED INITIAL DISCLOSURE  
STATEMENT

DEFENDANT MATSON NAVIGATION COMPANY, INC.'S  
AMENDED INITIAL DISCLOSURE STATEMENT

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Matson Navigation Company, Inc. ("Matson") submits the following amended initial disclosure statement:

A. Individuals With Discoverable Information

1. Bert Meyer  
c/o Law Offices of Preston Easley
2. Thomas Stapleton  
c/o Goodsill Anderson Quinn & Stifel, LLP
3. Eric Johnson  
c/o Goodsill Anderson Quinn & Stifel, LLP
4. Chris Schlarb  
c/o Goodsill Anderson Quinn & Stifel, LLP
5. Steve Rubin  
c/o Goodsill Anderson Quinn & Stifel, LLP
6. John Robinette  
c/o Goodsill Anderson Quinn & Stifel, LLP
7. Paul Londynsky  
c/o Goodsill Anderson Quinn & Stifel, LLP
8. Henry Olson  
c/o Goodsill Anderson Quinn & Stifel, LLP
9. John Lawrence Bergin  
c/o Goodsill Anderson Quinn & Stifel, LLP
10. Daniel Farney  
Matson Terminals, Inc.

11. Dennis Smith  
c/o Hughes & Taosaka
12. Danny Kaneala
13. Raymond Antone
14. Peter Craig  
c/o Hughes & Taosaka
15. Greg Kinnell  
c/o Hughes & Taosaka
16. John Davis  
c/o Hughes & Taosaka
17. Representative of McCabe Hamilton & Renny Co., Ltd.
18. Representative of Matson Terminals, Inc.
19. Heidi Kahlbaum (Frank Gates Acclaim)
20. Dr. Clifford Lau

These individuals are believed to have knowledge regarding liability and damages. Matson reserves the right to identify additional witnesses prior to trial.

B. Documents

See documents produced through discovery. Matson reserves the right to produce additional documentation in support of its claims or defenses as discovery continues.

C. Computation of Damages

Not applicable.

D. Insurance Agreements

Matson has P&I coverage in an amount sufficient to satisfy Plaintiff's claims as alleged in the complaint.

DATED: Honolulu, Hawaii, March 14, 2006.

/s/ Randolph L.M. Baldemor

JOHN R. LACY

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Attorneys for Defendant

MATSON NAVIGATION COMPANY,  
INC.